

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

KIMIESHA HILL, et al., on behalf of themselves))	
and all others similarly situated,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 5:21-cv-00097-SLP
)	
TOWN OF VALLEY BROOK, et al.,)	
)	
Defendants.)	
)	

**PLAINTIFFS’ UNOPPOSED MOTION FOR LEAVE TO FILE
SUPPLEMENTAL BRIEF IN SUPPORT OF THEIR MOTION TO COMPEL
DEFENDANTS TO PRODUCE DOCUMENTS**

Plaintiffs Kimiesha Hill, Kiara McCorkle, and Jason Garnett (“Plaintiffs”), in accordance with Local Civil Rule 7.1(i), respectfully request permission to file a supplemental brief in support of their Motion to Compel Defendants to Produce Documents. *See* ECF No. 50. Plaintiffs have consulted with counsel for Defendants, who do not oppose the relief sought in this Motion. In support of this Motion, Plaintiffs state as follows:

1. On October 25, 2022, Plaintiffs filed a Motion to Compel Defendants to Produce Documents (“Motion to Compel”), seeking Court intervention for Defendants’ continued and unexplained failure to timely produce documents. *Id.* Defendants filed their Response on November 22, 2022. Defs.’ Resp., ECF No. 56. The Plaintiffs’ Reply and a Joint Report, specifying remaining outstanding issues, were filed on November 29, 2022.

ECF Nos. 57 & 58. This Court has scheduled a hearing on Plaintiffs' Motion to Compel (the "Hearing") for March 23, 2023. ECF No. 74.

2. Since filing their Motion to Compel, Plaintiffs continued to diligently pursue fact and class discovery by taking depositions and serving Interrogatories and Requests for Admissions. Defendants produced certain responsive documents, but substantial deficiencies in Defendants' production persist. Plaintiffs request an opportunity to provide further detail regarding outstanding documents.

3. In addition, Plaintiffs seek to describe recently discovered challenges in obtaining "ticket jackets" or what Defendants characterize as the "municipal court's files." Because of Defendants' delays, Plaintiffs enlisted a vendor to scan these municipal court records. Even still, Defendants have not provided access to all ticket jackets relevant to this case, as at least the entire year of 2021 is unavailable to Plaintiffs. Equally critical, Plaintiffs only recently discovered that Defendants cannot locate original files for the named Plaintiffs.

4. Thus, Plaintiffs respectfully request that this Court allow them to supplement their Motion to Compel in a brief limited to five (5) pages and within five (5) days of this Court granting this Motion.

5. Defendants do not object to the relief requested in this Motion.

6. Plaintiffs have submitted a Proposed Order in accordance with the Local Rules.

Dated: March 15, 2023

Respectfully submitted,

/s/ Jonathan M. Irwin

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CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of March 2023, I electronically submitted the attached document to the Clerk of Court using the ECF System. Based on the records currently on file, the Clerk of the Court will transmit a Notice of Electronic Filing to the ECF registrants on file.

s/Jonathan Irwin
Jonathan M. Irwin